

Date: March 5, 2001

DSL-BQA-01-012

To: Ambulatory Surgical Centers

ASC 03

From: Otis Woods, Section Chief
Health Services Section

Via: Susan Schroeder, Director
Bureau of Quality Assurance

HCFA Clarification Memo

Double Occupancy Operating Rooms

Attached please find an informational release from HCFA, sent to the Bureau of Quality Assurance (BQA) as an interpretive memo. BQA is forwarding it to you for your information.

If you have further questions about double-occupancy operating rooms, you may contact:

Juan Flores, Supervisor, Southern Team, Health Services Section (HSS) at (608) 261-7824.

Jane Walters, Supervisor, Northern Team, Health Services Section (HSS) at (608) 267-7389.

Jean Kollasch, Consultant, Provider Regulation and Quality Improvement Section (PRQI) at (608) 267-0466.

DATE: February 6, 2001

FROM: Director
Office of Clinical Standards and Quality

SUBJECT: Double-Occupancy Operating Rooms

TO: Associate Regional Administrator
Division of Health Standards and Quality
Regions I-X

The purpose of this memorandum is to clarify the Health Care Financing Administration's (HCFA's) policy on the issue of simultaneous surgeries performed in one operating room.

This issue was brought to our attention by a Medicare-certified Ambulatory Surgical Center (ASC) seeking approval from HCFA to provide services in this manner. This ASC defines a double-occupancy operating room as two separate operating rooms within one physical location. Preparation of the patient before surgery is the same as those procedures for a single-occupancy operating room. Instruments are not shared. Anesthesia personnel and the circulation nurse are shared between the two patients.

HCFA explored this issue with the Centers for Disease Control, American College of Surgeons, and the Association of periOperative Registered Nurses. There was a concurrence among the groups about concerns related to patient safety, infection control, increased risk of error, patient privacy, operating room suite size regulations, emergency scenarios, billing and fraud issues. HCFA must ensure beneficiaries receive the safest, most effective and current standard of practice in surgical care. Indeed our current payment rates were established based on single occupancy. Until further research provides medical evidence of the safety and effectiveness of this practice, HCFA cannot endorse double-occupancy operating room practice in any healthcare setting.

Please transmit a copy of this memorandum to the State survey agencies in your region. You may direct any questions to Jacqueline Morgan of my staff at (410) 786-4282.

/s/

Jeffrey L. Kang, MD, MPH

cc: David Eddinger, CMSO
Frank Sokolik, CMSO
Joan Simmons, CMSO
Mike Goldman, CMSO